

We have reviewed the draft “Industrial Stormwater General Permit” issued for public comment on March 29, 2002. Our comments pertaining to the subject draft permit are provided below.

1. S1B, Page 5, Item 3 - When is Coverage under the Industrial Stormwater General Permit Not Required?

- Item 3 should be expanded to indicate that industrial facilities that discharge all of their stormwater to the ground and have no source discharge to surface water or a municipal storm sewer are not required to submit “No Exposure” Certification and/or other certification.
- This section should be expanded to clearly indicate those industrial facilities that discharge stormwater to permitted industrial wastewater land application sites for management are not required to secure a permit.

2. S3D – Stormwater Discharges to Impaired Waterbodies

- There are likely many facilities that do not discharge storm water directly into impaired water bodies but indirectly to impaired water bodies (i.e., municipal stormwater sewer with many users (including farmers) that eventually flows to an impaired water body). As provided in the permit, it is not clear if such facilities are also obligated to test for 303(d) listed parameters.

3. S4B3, Page 23 – Chemical and Allied Products, Food and Kindred Products

- Last Paragraph First Sentence – Remove “ammonia” and replace with “nitrate/nitrite” since ammonia will not be sampled/tested. Should read “The Permittee may suspend stormwater sampling and analysis for nitrate/nitrite, total phosphorus, and BOD5...”

4. S9A4, Page 33 – General Requirements/Modifications

- Capital BMPs – Capital budgets are typically developed on an annual basis and not on a six month basis. This means modification of capital budgets on a six-month basis can be difficult at best. Further, bids and design work are typically required for capital projects. As you probably can appreciate, all of these activities can take a considerable amount of time. Accordingly, we request that the permit be modified to indicate that capital BMPs need to be completed within one-year and not within six months.

5. S5, Page 26 – Reporting and Recordkeeping Requirements

- Reporting – Annual reporting of stormwater data would be more efficient and reduce paperwork. Note that annual reporting of stormwater data is common place in other states (e.g., California).

- Reporting Due Dates – Selected laboratories sometimes have a hard time turning around laboratory testing data. Therefore, at least 45-days should be provided from the close of each quarter for submittal of required monitoring data.

Thank you for the opportunity to comment on the draft permit.